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31 *Attorneys for Defendant*

32 RASH CURTIS & ASSOCIATES

33 UNITED STATES DISTRICT COURT
34 NORTHERN DISTRICT OF CALIFORNIA

35 SANDRA McMILLION, JESSICA
36 ADEKOYA, and IGNACIO PEREZ, on
37 Behalf of Themselves and all Others Similarly
38 Situated,

39 Case No. 4:16-cv-03396-YGR

40 **AMENDED JOINT TRIAL EXHIBIT
41 LIST**

42 Date: March 29, 2019

43 Time: 1:00 p.m.

44 Courtroom 1, 4th Floor

45 Hon. Yvonne Gonzalez Rogers

46 Plaintiffs,

47 v.

48 RASH CURTIS & ASSOCIATES,

49 Defendant.

1 I. PLAINTIFFS' TRIAL EXHIBIT LIST:
2

3 EXHIBIT 4 NUMBER (NO.)	5 DESCRIPTION	6 SPONSORING 7 WITNESS	8 SINCE 9 TO 10 ADMIT	11 OBJECTION	12 DATE 13 ADMITTED
1 1 Perez Account RCA 001-004	2 Dan Correa	3 Yes	4 58	5 5-8-19	6
7 2 Global Connect Manual RCA 044-120	8 Dan Correa	9 Yes	10	11	12
13 3 Intentionally left blank.	14	15 N/A	16	17	18
19 4 Intentionally left blank.	20	21 N/A	22	23	24
25 6 9/28/12 Status Code Matrix	26 Dan Correa	27 Yes	28 58-19	1 5819	2
3 7 Intentionally left blank.	4	5 N/A	6	7	8
9 8 2/13/16-2/18/16 emails w. N. Keith, N. Paff, B. Keith, T. Paff re cell phones/phone fields	10 Nick Keith	11 Yes	12 5-7-19	13 5-7-19	14
15 9 2/24/14-2/25/14 emails w/ N. Paff, N. Keith, Kizer, B. Keith, C. Paff, T. Paff re cell/phone field	16 Nick Keith	17 Yes	18 5-7-19	19 5-7-19	20
21 10 8/3/15-8/4/15 emails w/ N. Keith, B. Keith, C. Paff, T. Paff, N. Paff re cell phone scrubs/phone fields	22 Nick Keith	23 Yes	24 5-7-19	25 5-7-19	26
27 11 5/12/16 emails w/ N. Keith, B. Keith, C. Paff re 5+ phone fields	28 Nick Keith	1 Yes	2 5-13	3 5-13-19	4
5 12 5/12/16 emails w. N. Keith, Dan Correa, Greg Wilbert re phone field 5+ custom	6 Nick Keith	7 Yes	8	9	10
11 13 Intentionally left blank.	12	13 N/A	14	15	16
20 14 Intentionally left blank.	19	18 N/A	17	16	15
19 15 Intentionally left blank.	18	17 N/A	16	15	14
18 16 Intentionally left blank.	17	16 N/A	15	14	13
17 17 Intentionally left blank.	16	15 N/A	14	13	12
16 18 Intentionally left blank.	15	14 N/A	13	12	11
15 19 DAKCS Software Systems Client Services Manual	14 Dan Correa	13 Yes	12	11	10
14 20 DAKCS Software Systems Client Services Utilities Help Manual	13 Dan Correa	12 Yes	11	10	9

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1 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	2 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	3 3 4 4 5 5 6 6 7 7 8 8 9 9 10 10 11 11 12 12 13 13 14 14 15 15 16 16 17 17 18 18 19 19 20 20 21 21 22 22 23 23 24 24 25 25 26 26 27 27 28	4 4 5 5 6 6 7 7 8 8 9 9 10 10 11 11 12 12 13 13 14 14 15 15 16 16 17 17 18 18 19 19 20 20 21 21 22 22 23 23 24 24 25 25 26 26 27 27 28	5 5 6 6 7 7 8 8 9 9 10 10 11 11 12 12 13 13 14 14 15 15 16 16 17 17 18 18 19 19 20 20 21 21 22 22 23 23 24 24 25 25 26 26 27 27 28	6 6 7 7 8 8 9 9 10 10 11 11 12 12 13 13 14 14 15 15 16 16 17 17 18 18 19 19 20 20 21 21 22 22 23 23 24 24 25 25 26 26 27 27 28	
TRIAL EXHIBIT NUMBER		DESCRIPTION	SPONSORING WITNESS	STATUS (INTRO, ADMITTED)	OBJECTION	DATE ADMITTED
21	DAKCS Software Systems Vocality Help Manual	Dan Correa	Yes			
22	DAKCS Software Systems Vocality Beyond and Sting Setup	Dan Correa	Yes			
23	County of Solano Amendment to Request for Qualifications for Healthcare Related Debt Collection Services	Dan Correa	No	Relevance FRE 400-403		
24	Rash Curtis & Associates Collection Agency Debt Recovery Services Company Information	Dan Correa	Yes	5-7-19	5-7-19	
26	5/25/15-5/27/15 emails w. D. Correa, D. Anderson, B. Conrad, Kizer, B. Keith, C. Paff re Sutter Foti Message	Dan Correa	No	Relevance FRE 400-403 5-7-19	5-7-19	
27	9/15/15 emails w. D. Anderson, D. Correa, C. Paff, K. Boddie, B. Conrad, Kizer re skip lists	Dan Correa	Yes	5-7-19	5-7-19	
28	Intentionally left blank.		N/A			
29	5/6/13 email w. B. Kimbell, D. Correa re status code campaigns	Dan Correa	Yes	5-7-19	5-7-19	
30	Intentionally left blank.		N/A			
31	Intentionally left blank.		N/A			
32	12/11/14-12/12/14 emails w. B. North, C. Paff, D. Correa, B. Kimbell, B. Conrad re opt out list	Dan Correa	Yes	5-7-19	5-7-19	
33	12/29/16 emails w/ D. Correa, M. Paff, T. Mitchell re cease and desist call lists	Dan Correa	Yes	5-7-19	5-7-19	
34	6/29/17 emails w. T. Paff, B. Keith, C. Paff, N. Paff re 2015 FCC Ruling	Bob Keith	No	Relevance FRE 400-403		
35	Intentionally left blank.		N/A			

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EXHIBIT NO.	DESCRIPTION	STORYBOARD WITNESS	STORYBOARD WITNESS	OBJECTION	DATE ADMITTED
36	10/12/16 email w. B. Keith, T. Paff, C. Paff re calling cell phones	Bob Keith	No	Relevance FRE 400-403	
37	1/5/16 email from B. Keith to staff re 90 day call count	Bob Keith	Yes		
38	5/5/16-5/6/16 emails w. D. Correa, B. Keith, B. North, C. Paff re blocking fields 5+	Bob Keith	Yes		
42	8/5/13 emails w. B. Kimbell, C. Paff, D. Correa, B. Keith, Kizer re back to school month	Chris Paff	No	Relevance FRE 400-403	
43	2/28/14 email w/ A. Hyden, C. Paff re CPS questions	Chris Paff	Yes		
44	6/15/17 email w. C. paff re robocalls	Chris Paff	Yes		
45	Questions Excerpted from the FCC's Robocall Blocking NOI	Chris Paff	Yes		
46	6/30/17 Declaration of Darrin Bird, ECF Doc. No. 50-3	Darrin Bird	Yes		
47	7/3/17 Declaration of Robert Keith, ECF Doc. No. 50-2	Bob Keith	Yes		
48	DAKCS Software Systems VIC Client, Exhibit 11 to 12/11/17 Krivoshey Decl., ECF Doc. No. 139-2 DAKCS00001-266	Randall A. Snyder	No	Relevance FRE 400-403 Not specific as to which portions or pages FRE 702	
49	Intentionally left blank.		N/A		
50	Exhibit 22 to 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	Yes		
51	Exhibit 23 to the 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	5619 58

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TRIAL EXHIBIT (NO.)	DESCRIPTION	SPONSORING WITNESS	STATE TO ADMIT	OBJECTION	DATE ADMITTED
52	Exhibit 2 to 4/13/18 Krivoshey Decl., ECF Doc. No. 190-1, RCA's Opposition to Plaintiff's Separate Statement of Undisputed Facts in Support of Summary Judgment or Partial Summary Judgment in <i>Hernandez v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02455-GHW (E.D. Cal. Nov. 13, 2017), ECF Doc. No. 34.	N/A	No	Relevance FRE 400-403	
53	5/5/16 emails w. N. Paff, B. Keith, C. Paff, D. Correa, T. Paff re human error	Dan Correa	Yes		
54	11/12/18 Supplemental Declaration of Randall A. Snyder	Randall A. Snyder	No	Relevance FRE 400-403 FRE 702	
55	11/12/18 Class Member Data Tabulation Report of Anya Verkhovskaya	Anya Verkhovskaya	No	Relevance FRE 400-403 FRE 702	
56	11/12/18 Declaration of Colin B. Weir	Colin B. Weir	No 57A (5-7) 57B	Relevance FRE 400-403 FRE 702	56A (5-7)
57	Global Connect Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 57C (5-7) 57B	Relevance FRE 400-403 FRE 702	57-C 5-7-19 57-A 5-7-19 57-B 5-7-19
58	VIC Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 58A 5-7 58B	Relevance FRE 400-403 FRE 702	58A 5-7-19 58B 5-7-19
59	TCN Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 59A 59B	Relevance FRE 400-403 FRE 702	59A 5-7 59B 5-7

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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	DATE ADMITTED
INTERVIEW NUMBER (N/A)	DESCRIPTION	SPONSORING WITNESS	SHOULD ADMIT	OBJECTION																								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	DATE ADMITTED
60	Defendant's Account Data as discussed by Colin Weir at his 12/11/18 Deposition (including all account numbers, demographic and personal information, and phone fields one through ten)	N/A	No	Relevance FRE 400-403 FRE 702 60-(57)																						5-7-19		
61	GC_calls2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702																						5-7-19		
62	TCN_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702																						5-7-19		
63	VIC_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	Relevance FRE 400-403 FRE 702																						5-7-19		
64	Intentionally left blank.		N/A																									
65	Defendant's Responses to Plaintiffs' First Set of Interrogatories	N/A	Yes																									
66	Defendant's Responses to Plaintiffs' First Set of Requests for Production	N/A	Yes																									
67	Global Connect Dialer Sample	N/A	Yes																									
68	Audit checklist RCA000121-123	N/A	Yes																									
69	Rash Curtis Policy & Procedure: Quality Assurance Program – audit guidelines RCA000124-135	N/A	Yes																									
70	Rash Curtis Quality Assurance Program – Employee Acknowledgement RCA000164	N/A	Yes																									

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1 EXHIBIT NO.	2 DESCRIPTION	3 SPONSORING WITNESS	4 SHOULD ADMIT	5 OBJECTION	6 DATE ADMITTED
71	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>McBride v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02390-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	Yes	Relevance FRE 400-403	
72	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>Oliver v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02413-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	No	Relevance FRE 400-403	
73	Defendant Rash Curtis & Associates' Reply Brief in Support of Motion for Summary Judgment or Partial Summary Judgment, ECF Doc. No. 157, at 13:6-13.	N/A	No	Relevance FRE 400-403	
74	Intentionally left blank.		N/A		
75	T-Mobile Production from Kevin Koslosky	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	
76	Account Record Abbreviations RCA000192-193	N/A	Yes		
77	Skip Tracing Instructions RCA000195-199	N/A	Yes	5-8	5-8-19
78	Unredacted Perez Account Notes RCA000268-271	Dan Correa	Yes	5-8	5-8-19
79	5/5/2015 email w. B. Keith to T. Paff RCA-278403	Bob Keith	Yes		
80	11/19/15 emails w. B. Keith, T. Paff, C. Paff re cell phones RCA-282301-282303	Bob Keith	No	Relevance FRE 400-403 Attorney-Client Privileged	5-13-19

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1 TRIAL EXHIBIT NO.	2 DESCRIPTION	3 SPONSORING WITNESS	4 SHIP TO ADMIT	5 OBJECTION	6 DATE ADMITTED
81	8/3/15 emails w/ B. Keith, N. Keith, C. Paff, T. Paff, N. Paff re cell phones RCA-281392	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged 5-13	5-13-19
82	11/19/15 emails w. T. Paff, C. Paff, B. Keith re cell phones RCA-282306-282308	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged	5-13-19
83	5/5/16 email w. B. Keith, C. Paff, D. Correa, T. Paff, N. Paff RCA-268070	Bob Keith	No	Relevance FRE 400-403 5-9-19	5-9-19
84	Transcript/Video Excerpts from 4/13/17 Deposition of Steven Kizer	Steven Kizer	Yes		
85	Transcript/Video Excerpts from 10/16/17 Deposition of Nick Keith	Nick Keith	Yes		
86	Transcript/Video Excerpts from 10/20/17 Deposition of Dan Correa	Dan Correa	Yes		
87	Intentionally left blank.		N/A		
88	Intentionally left blank		N/A		

UNITED STATES DISTRICT COURT
for the Northern District of California

Case No.

16-N-3396-46R

Date

2019

PEREZ

VS.

RASH CURNS & ASSOCIATES

EXHIBIT LIST



Plaintiff



Defendant

II. DEFENDANT'S TRIAL EXHIBIT LIST:

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
501	Intentionally left blank.		N/A		
502	Intentionally left blank.		N/A		
503	Rash Curtis' Collection Notes/Business Records for Daniel Reynoso (RCA 268-271).	Bob Keith	Yes		
504	Daniel Reynoso's Medical Records from Sutter General Hospital (RCA 272-278).	Bob Keith	No	MIL 2, FRE 802, 403, FRCP 37	
505	May 5, 2017 Email from Bob Keith to Mike Paff attaching Sutter General Hospital's Client Notes for Daniel Reynoso (RCA 012718-012724).	Bob Keith	No	MIL 2, FRE 802, 403, 801, 803	
506	Rash Curtis' Business Records, showing the ECA Advanced Trace Report received as to Daniel Reynoso, which shows the cell phone number ending in 5193 was not skip-traced (RCA 279).	Nick Keith	No	MIL 1, FRCP 37	
507	Rash Curtis' Business Records, showing the Edit Tracking Report for Daniel Reynoso's account, which shows the cell phone number ending in 5193 was provided to Rash Curtis by Sutter General Hospital on May 7, 2015 and removed by Rash Curtis on June 7, 2016 (RCA 280).	Nick Keith	No	MIL 1, FRCP 37	

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	508	Intentionally left blank.		N/A		
	509	Intentionally left blank.		N/A		
	510	Intentionally left blank.		N/A		
	511	Rash Curtis' Abbreviation Key for Collection Notes (RCA 192-193).	Bob Keith	Yes		
	512	Plaintiffs' Notice of Subpoenas to Produce Documents and Subpoenas to T-Mobile USA, Inc., LexisNexis Risk Data Management, Inc., and LexisNexis Risk Solutions FL, Inc., served on April 26, 2017.	Ignacio Perez	No	FRE 401, 403	
	513	Phone Records Produced by T-Mobile (MetroPCS) in Response to Plaintiffs' Subpoena, produced on August 16, 2017.	Ignacio Perez	Yes		
	514	Intentionally left blank.		N/A		
	515	Intentionally left blank.		N/A		
	516*	True and correct copies of excerpts from the Deposition of Nick Keith, taken October 16, 2017.	Nick Keith	No	MIL 7	
	517*	True and correct copies of excerpts from the Deposition of Daniel Correa, taken October 20, 2017.	Daniel Correa	No	MIL 7	
	518*	True and correct copies of excerpts from the Deposition of Chris Paff, taken October 24, 2017.	Chris Paff	No	MIL 7	
	519*	True and correct copies of excerpts from the	Robert Keith	No	MIL 7	

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1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	Deposition of Robert Keith, taken October 24, 2017.				
5 520	True and correct copies of excerpts from the Deposition of Plaintiff Ignacio Perez, taken July 13, 2017.	Ignacio Perez	No	MIL 7	
8 521	True and correct copies of excerpts from the Deposition of Steven Kizer, taken April 13, 2017.	Steven Kizer	No	MIL 7	
11 522	December 20, 2018 Invoice from Class Experts Group, LLC to Burson & Fisher, P.A. (McMillion000099).	Anya Verkhovskaya	Yes		
14 523	True and correct excerpts from "5 Fuzzy Match Output Step 2 Final" (not bates-stamped).	Anya Verkhovskaya	Yes	58-19	58-19
17 524	True and correct excerpts from "2018-10-16 historical 1-4 version 1 101518" Spreadsheet (not bates-stamped).	Nick Keith	Yes		
20 525	Plaintiffs' Notice of Subpoena and Subpoena to Testify at a Deposition in a Civil Action to DAKCS Software Systems, Inc., served on October 11, 2017.	Ignacio Perez	No	FRE 401, 403	
24 526	Business Records Produced by DAKCS Software Systems, Inc. in Response to Plaintiffs' Subpoena, produced on November 2, 2017 (DAKCS 00001-00266).	Ignacio Perez	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 527	14 October 16, 2015 Email 15 from Steven Kizer to 16 Bob Keith and Chris Paff 17 regarding Rash Curtis' 18 policies on skip-tracing 19 and removing phone 20 numbers upon Do-Not- 21 Call requests (RCA 22 125254-125255).	23 Bob Keith	24 No	25 FRE 801, 802, 26 803	27
28 528	29 February 28, 2014 Email 30 from Ashlee Hyden of 31 DAKCS Software 32 Systems, Inc. to Chris 33 Paff regarding cell phone 34 scrub technology (RCA 35 040794).	36 Chris Paff	37 No	38 FRE 801, 802, 39 803	40
41 529	42 May 16, 2016 Email 43 from Nick Keith to 44 Daniel Correa regarding 45 GlobalConnect's 46 outbound limitations 47 (RCA 133979-133982).	48 Nick Keith	49 No	50 FRE 801, 802, 51 803	52
53 530	54 August 4, 2015 Email 55 from Nick Keith to Bob 56 Keith regarding phone 57 numbers supplied to 58 Rash Curtis from its 59 creditor-clients (RCA 60 258388-258391).	61 Nick Keith/Bob Keith	62 No	63 FRE 801, 802, 64 803	65
66 531	67 August 4, 2015 Email 68 from Nick Keith to Bob 69 Keith regarding Rash 70 Curtis' policy to separate 71 verified phone numbers 72 from unverified phone 73 numbers (RCA 258397- 74 258400).	75 Nick Keith/Bob Keith	76 No	77 FRE 801, 802, 78 803	79
80 532	81 December 11, 2017 82 Email from Randall 83 Snyder to Yeremey 84 Krivoshey 85 (McMillion000013- 86 000026).	87 Randall Snyder	88 Yes	89	90

1	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
3	533	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000034).	Anya Verkhovskaya	Yes	5-8-19	5-8-19
6	534	January 30, 2018 Email from Yeremey Krivoshey to Anya Verkhovskaya (McMillion000035).	Yeremey Krivoshey	Yes	5-8	5-8-19
9	535	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000036).	Anya Verkhovskaya	Yes	5-8	5-8-19
12	536	November 27, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000053).	Randall Snyder	Yes		
15	537	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000054-000055).	Randall Snyder	Yes		
18	538	December 11, 2018 Email from Rebecca Richter to Randall Snyder (McMillion000072).	Randall Snyder	Yes		
21	539	May 2, 2017 Email from Colin Weir to Scott Burstor (McMillion000086).	Colin Weir	Yes	5-8-19	5-8-19
24	540	September 5, 2017 Email from Colin Weir to Scott Burstor (McMillion000087).	Colin Weir	Yes	5-8	5-8-19
27	541	September 4, 2018 Email from Colin Weir to Scott	Colin Weir	Yes	5-8	5-8-19

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1	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
2		Bursor (McMillion000088).				
3	542	January 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000089).	Colin Weir	Yes	58	5-8-19
4	543	March 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000090).	Colin Weir	Yes	58	5-8-19
5	544	February 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000091).	Colin Weir	Yes		
6	545	August 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000092).	Colin Weir	Yes	5-8	5-8-19
7	546	April 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000093).	Colin Weir	Yes	5-8	5-8-19
8	547	June 1, 2017 Email from Colin Weir to Scott Bursor (McMillion000094).	Colin Weir	Yes	5-8	5-8-19
9	548	December 4, 2017 Email from Colin Weir to Scott Bursor (McMillion000095).	Colin Weir	Yes	5-8	5-8-19
10	549	December 5, 2018 Email from Colin Weir to Scott Bursor (McMillion000096).	Colin Weir	Yes	5-8	5-8-19
11	550	November 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000097).	Colin Weir	Yes	58	5-8-19
12	551	October 2, 2018 Email from Colin Weir to Scott	Colin Weir	Yes	5-8	5-8-19

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1	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
2		Bursor (McMillion000098).				
3	552	December 17, 2018 Invoice from Wireless Research Services to Bursor & Fisher, P.A. (McMillion000076).	Colin Weir	Yes		
4	553	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000059- 000060).	Randall Snyder	Yes		
5	554	True and correct copies of excerpts from the Deposition of Anya Verkhovskaya, taken December 6, 2018.	Anya Verkhovskaya	No	MIL 7	
6	555	Excerpts from the Spreadsheet Associated with Anya Verkhovskaya's Rule 26 Report (Exhibit 2 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes	5-8	5-8/9
7	556	Notice of Deposition of Anya Verkhovskaya (Exhibit 3 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	No	FRE 401, 403	
8	557	Declaration of Anya Verkhovskaya (Exhibit 4 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
9	558	Retainer Agreement between Anya Verkhovskaya and Bursor & Fisher, P.A. (Exhibit 5 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
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1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 559	14 Invoice 1022 from CEG 15 to Burson & Fisher, P.A. 16 (Exhibit 6 to the 17 Deposition of Anya 18 Verkhovskaya).	19 Anya 20 Verkhovskaya	21 Yes	22	23
24 560	25 Invoice 1121 from CEG 26 to Burson & Fisher, P.A. 27 (Exhibit 7 to the 28 Deposition of Anya Verkhovskaya).	29 Anya Verkhovskaya	30 Yes	31	32
33 561	34 True and correct copies 35 of excerpts from the 36 Deposition of Colin 37 Weir, taken December 38 11, 2018.	39 Colin Weir	40 No	41 MIL 7	42
43 562	44 Notice of Deposition of 45 Colin Weir (Exhibit 1 to 46 the Deposition of Colin 47 Weir).	48 Colin Weir	49 No	50 FRE 401, 403	51
52 563	53 Declaration of Colin 54 Weir (Exhibit 2 to the 55 Deposition of Colin 56 Weir).	57 Colin Weir	58 Yes	59	60
61 564	62 Engagement Agreement 63 between Colin Weir and 64 Burson & Fisher, P.A. 65 (Exhibit 3 to the 66 Deposition of Colin 67 Weir).	68 Colin Weir	69 Yes	70 58	71 58-19
72 565	73 November 30, 2018 74 Invoice from Economics 75 and Technology, Inc. to 76 Burson & Fisher, P.A. 77 (Exhibit 4 to the 78 Deposition of Colin 79 Weir).	80 Colin Weir	81 Yes	82	83
84 566	85 Further Invoices from 86 Economics and 87 Technology, Inc. to 88 Burson & Fisher, P.A. 89 (Exhibit 5 to the	90 Colin Weir	91 Yes	92	93

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
	Deposition of Colin Weir).				
567	Statement of Qualifications of Colin Weir (Exhibit 6 to the Deposition of Colin Weir).	Colin Weir	Yes		
568	True and correct copies of excerpts from the Deposition of Randall Snyder, taken December 17, 2018.	Randall Snyder	No	MIL 7	
569	Notice of Deposition of Randall Snyder (Exhibit 1 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 401, 403	
570	Curriculum Vitae (Professional Summary) of Randall Snyder (Exhibit 2 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
571	Curriculum Vitae (Litigation Support Experience) of Randall Snyder (Exhibit 3 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
572	Wireless Research Services, LLC 2017 Rate Sheet and Retained Agreement with Burson & Fisher, P.A. (Exhibit 4 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
573	November 12, 2018 Supplemental Declaration of Randall Snyder (Exhibit 5 to the Deposition of Randall Snyder).	Randall Snyder	Yes		

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO 9 ADMIT	10 OBJECTION	11 DATE 12 ADMITTED
13 574	14 May 29, 2017 Invoice 15 from Wireless Research 16 Services, LLC to Burson 17 & Fisher, P.A (Exhibit 6 18 to the Deposition of 19 Randall Snyder).	20 Randall Snyder	21 Yes	22	23
24 575	25 "Exactly What Is An 26 Autodialer?" Power- 27 point Presentation 28 (Exhibit 7 to the Deposition of Randall Snyder).	29 Randall Snyder	30 Yes	31	32
33 576	34 May 30, 2017 35 Declaration of Randall 36 Snyder (Exhibit 9 to the 37 Deposition of Randall 38 Snyder).	39 Randall Snyder	40 No	41 FRE 403	42
43 577	44 October 16, 2017 45 Declaration of Randall 46 Snyder (Exhibit 10 to the 47 Deposition of Randall 48 Snyder).	49 Randall Snyder	50 No	51 FRE 403	52
53 578	54 December 11, 2017 55 Declaration of Randall 56 Snyder (Exhibit 11 to the 57 Deposition of Randall 58 Snyder).	59 Randall Snyder	60 No	61 FRE 403	62
63 579	64 March 5, 2018 65 Declaration of Randall 66 Snyder (Exhibit 12 to the 67 Deposition of Randall 68 Snyder).	69 Randall Snyder	70 No	71 FRE 403	72
73 580	74 True and Correct 75 Excerpts from the June 76 20, 2017 Deposition of 77 Steve Kizer (Exhibit 14 78 to the Deposition of 79 Randall Snyder).	80 Randall 81 Snyder, Steven 82 Kizer	83 No	84 MIL 7, MIL 5, 85 FRE 401, 403	86

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO ADMIT	9 OBJECTION	10 DATE 11 ADMITTED
12 581	13 December 11, 2017 14 Declaration of Bob Keith (Exhibit 15 to the 15 Deposition of Randall 16 Snyder).	17 Randall Snyder	18 No	19 MIL 5, FRE 401, 20 403	21
22 582	23 Daniel Reynoso's 24 Account Records (Exhibit 16 to the 25 Deposition of Randall 26 Snyder).	27 Randall Snyder	28 No	29 MIL 1, FRCP 37	30
31 583	32 Complaint for TCPA 33 damages, styled <i>Diane 34 Steele v. Rash Curtis & 35 Associates</i> , United States 36 District Court, Eastern 37 District of California, 38 Case No. 2:17-cv-02626- 39 JAM-AC, filed 12/15/17.	40 Bob Keith	41 No	42 FRCP 37, FRE 43 401, 403, 802, 44 Scheduling 45 Order (ECF 246)	46
47 584	48 Medical account 49 overview from Contra 50 Costa Regional Medical 51 Center for Steven 52 Milligan, showing the 53 925-435-6429 phone 54 number and that the 55 account was assigned to 56 Rash Curtis for 57 collection.	58 Bob Keith	59 No	60 FRCP 37, FRE 61 401, 403, 802, 62 Scheduling 63 Order (ECF 246)	64
65 585	66 Medical account 67 overview for Diane 68 Steele, showing the 925- 69 435-6429 phone number 70 and that the account was 71 assigned to Rash Curtis 72 for collection.	73 Bob Keith	74 No	75 FRCP 37, FRE 76 401, 403, 802, 77 Scheduling 78 Order (ECF 246)	79

1 TRIAL 2 EXHIBIT 3 NO.	4 DESCRIPTION	5 SPONSORING 6 WITNESS	7 STIP. 8 TO ADMIT	9 OBJECTION	10 DATE 11 ADMITTED
12 586	13 True and Correct 14 Excerpts from the June 15 20, 2017 Deposition of 16 Steven Kizer from <i>Rash</i> 17 <i>Curtis & Associates, Inc.</i> 18 <i>v. Steven Kizer</i> , Superior 19 Court of the State of 20 California County of Solano Case No. FCS048565.	21 Steven Kizer	22 No	23 FRCP 37, FRE 24 401, 403, 802, 25 Scheduling Order (ECF 246)	26
27 587	28 True and Correct 29 Excerpts from the July 6, 30 2017 Deposition of 31 Steven Kizer from <i>Rash</i> 32 <i>Curtis & Associates, Inc.</i> 33 <i>v. Steven Kizer</i> , Superior 34 Court of the State of 35 California County of 36 Solano Case No. FCS048565.	37 Steven Kizer	38 No	39 FRCP 37, FRE 40 401, 403, 802, 41 Scheduling Order (ECF 246)	42
43 588	44 Complaint for the Labor 45 Commissioner's Office 46 filed by Steven Kizer 47 against Rash Curtis, State 48 Case No. 08-78737, filed 49 September 16, 2016	50 Steven Kizer	51 No	52 FRCP 37, FRE 53 401, 403, 802, 54 Scheduling Order (ECF 246)	55
56 589	57 Final Order and Decision 58 in Kizer's Labor Board 59 case against Rash Curtis, 60 State Case No. 08-78737, 61 dated August 22, 2018.	62 Steven Kizer	63 No	64 FRCP 37, FRE 65 401, 403, 802, 66 Scheduling Order (ECF 246)	67
68 590	69 Kizer's "Notice of 70 Claim" and time/wages 71 claimed in State Case 72 No. 08-78737, dated 73 January 20, 2017.	74 Steven Kizer	75 No	76 FRCP 37, FRE 77 401, 403, 802, 78 Scheduling Order (ECF 246)	79
80 591*	81 Personnel Action Form 82 for Steven Kizer, signed 83 by Steven Kizer on 84 December 1, 2012.	85 Steven Kizer	86 No	87 FRCP 37, FRE 88 401, 403, 802, 89 Scheduling Order (ECF 246)	90

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	592*	Inbound Phone Line; Expectations and Rules, signed by Steven Kizer on July 2, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	593*	Certificate of Completion – Workplace Harassment: Prevention and the law-Supervisor Field 120, certifying Steven Kizer's completion on May 28, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	594*	Policy & Procedure: Harassment Free Workplace ("Management"), signed by Steven Kizer on March 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	595*	Interoffice Memo to exempt employees, signed by Steven Kizer on December 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	596*	Kizer email dated May 26, 2016.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	597*	Payroll Summary re Steven Kizer 12/2012 – 12/2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	598*	Kizer email with self-authored Biography, dated May 6, 2013	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
	599*	Work Order Guidelines issued by Steven Kizer dated March 12, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
600*	Steven Kizer's resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
601*	Steven Kizer's IT Job Description.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
602*	Steven Kizer's LinkedIN Resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
603*	Steven Kizer's internal email communications at Rash Curtis	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
604*	Excerpts from Steven Kizer's Absence/Schedule Adjustment Request Forms	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
605*	Steven Kizer's Paid Time Off Statements	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
606*	Email re Steven Kizer's FMLA/CFRA Leave, dated March 21, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
607	Comparison Exhibits re wage claims and PTO	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

UNITED STATES DISTRICT COURT
for the Northern District of California

Case No. 16-cv-3396-YGRDate 2019Perez

vs.

RASIT CURNS & ASSOCIATES

EXHIBIT LIST



Plaintiff



Defendant

EXHIBIT NUMBER	DESCRIPTION	SPONSORING WITNESS	DATE	
			Marked for Identification	Admitted in Evidence
608A	DOC	VER KHOVSKAYA	5-8	5-8-19
608D	DOC			
609A	DOC		5-8	5-8-19
610A	DOC		5-8	5-8
610D	DOC			
611A	DOC		5-8	5-8
611D	DOC			
612	DOC		5-9	5-9-19